

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ANTHONY DERUBEIS )	
AND )	
MACLYN BURNS )	
)	
Plaintiffs )	
)	
v. )	CIVIL ACTION NO. 04 11137 RWZ
)	
WITTEN TECHNOLOGIES, INC. )	
)	
Defendants )	
)	

**JOINT MOTION TO EXTEND DISCOVERY FOR THIRTY DAYS**

NOW COME the above-captioned parties, by and through counsel, and hereby move this Honorable Court to extend the discovery period for thirty days, from February 2006 to March 2006. In support of this Motion, the parties state that neither party shall be prejudiced by this proposed thirty day extension.

The Plaintiffs,  
By their Attorney,

/s/ Daniel M. Rabinovitz  
Daniel M. Rabinovitz, Esq.,  
BBO No.: 558419  
Menard, Murphy & Walsh LLP  
60 State Street, 34th Floor  
Boston, Massachusetts 02109

The Defendants,  
By their Attorney,

/s/ Erin L.G. Lewis  
Erin L. G. Lewis, Esq.  
Georgia State Bar No. 450320  
Witten Technologies, Inc.  
3638 Overlook Avenue  
Macon, Georgia 31204

Jay Presser, Esq.  
BBO No.: 405760  
Amy Royal, Esq.  
BBO No.: 647175  
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One Monarch Place  
Springfield, MA 01144

*Local Counsel*

**CERTIFICATE OF SERVICE**

I, Daniel M. Rabinovitz, hereby certify that on this 3rd day of November, 2005, I caused a copy of this Joint Motion to Extend Discovery for Thirty Days to be served by first-class mail, postage prepaid, addressed to Jay M. Presser Esq. Skoler, Abbott & Presser P.C. One Monarch Place Suite 2000 Springfield Massachusetts 01144 and filed electronically on November 3, 2005.

/s/ Daniel M. Rabinovitz